



December 28, 2017

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street,  
S.W. Room TW-A325  
Washington, D.C. 20554

**RE: CG Docket No. 17-59, Advanced Methods to Target and Eliminate Unlawful Robocalls**

Dear Ms. Dortch:

On December 14, 2017, representatives of Danal, Inc. ("Danal"), James Greenwell, CEO and President, Anand D'Souza, Director of Product, and Sreekant Vijayakumar, Solutions Architect, met with key Federal Communications Commission ("FCC") representatives, Kurt Schroeder, Division Chief of the Telecommunications Consumers Division, John B. Adams, Deputy Division Chief, Josh Zeldis, Attorney Advisor, and Karen Schroeder, Attorney Advisor to discuss the FCC's Notice of Inquiry regarding robocalls to reassigned phone numbers, and Danal's response. We specifically discussed how Danal's TCPA compliance solution ("Service") has an established reassignment phone number database and is commercially available and utilized Service in the marketplace today.

During this meeting, Danal reiterated to the FCC representatives its November 6, 2017 response to the CG Docket No. 17-59; namely, the key capabilities of Danal's Service and the unique functionality of our access to and use of Mobile Network Operator (MNO) data for the purposes of identifying reassignments.

MNO data is critical for a TCPA compliance solution to be truly effective, and Danal is one of the very select few authorized service provider approved to utilize MNO data for its Service to companies. A reassigned phone number database utilizing MNO data, such as the one Danal maintains, is prominent, as MNO data provides the most accurate information on who owns a given phone number. Currently, there are other TCPA compliance solution providers in the marketplace whose TCPA compliance solutions do not truly utilize MNO data. While these TCPA compliance solution providers have access to MNO data, it is for purposes other than identifying reassignments; thus companies are, unbeknownst to them, utilizing poor quality solutions thereby still remaining exposed to high risk of non-compliance.

Danal's Service has been tested against the services of other such TCPA compliance solution providers numerous times; two of the largest MNOs in the US selected Danal as their very own TCPA compliance solution provider. Danal still continues to verify phone ownership and actively monitors phone numbers for reassignments for these two MNOs, and several other enterprise customers including one of the top 5 US banks.

Danal has put forth the idea of an FCC certified TCPA compliance solution that is able to identify reassignments proactively, such as Danal's TCPA compliance solution. Such a certification will help companies select the best available TCPA compliance solution for greater conformity to TCPA rules and eliminate consumer complaints related to incorrect calls.

Sincerely,

A handwritten signature in black ink, appearing to read 'Sreekanth', with a horizontal line underneath.

Sreekant Vijayakumar  
Solutions Architect

CC: Kurt Schroeder  
Josh Zeldis